

John E. Keefe, Jr.  
Keefe Bartels, LLC  
170 Monmouth Street  
Red Bank, New Jersey 07701  
(732) 224-9400

Barry R. Eichen, Esq.  
EICHEN CRUTCHLOW ZASLOW &  
McELROY, LLP  
40 Ethel Road  
Edison, New Jersey 08817  
(732) 777-0100

*Co-Counsel for the Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IMRAN CHAUDHRI, DEIDRA  
ROSS, RICHARD SMITH, LARRY  
BYRD, DAVID CHRISTOPHER,  
DEREK HAHN and LEE S. KELLY,  
individually, and on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

OSRAM SYLVANIA , INC., and  
OSRAM SYLVANIA PRODUCTS,  
INC.,

Defendants.

Case No. 2:11-CV-05504 (SDW)(MCA)

**NOTICE OF MOTION**

TO: ALL COUNSEL ON ECF LIST

PLEASE TAKE NOTICE that on such date and time as the Court shall direct, the undersigned Co-Counsel for Plaintiffs shall move before the Hon. Madeline Cox Arleo, U.S.M.J., M.L. King, Jr. Federal Bldg. & Courthouse, Room 2060, 50 Walnut Street, Newark, New Jersey 07102, for an Order preliminarily approving the proposed settlement, certifying a settlement class, approving class notice and other relief in accordance with Fed R. Civ. P. 23.

In Support of this Motion, Plaintiffs shall rely upon the annexed Certification of John E. Keefe, Jr. and Brief in Support of Preliminary Approval.

The undersigned requests oral argument.

KEEFE BARTELS, LLC  
Co-Counsel for the Plaintiffs

Dated: June 30, 2014

By: /s/ John E. Keefe, Jr.  
JOHN E. KEEFE, JR.

Barry R. Eichen, Esq.  
EICHEN CRUTCHLOW ZASLOW &  
McELROY, LLP  
40 Ethel Road  
Edison, New Jersey 08817  
(732) 777-0100